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9 Attorneys for Plaintiffs,  
10 **ELIZABETH LAVALLE,**  
11 **and all others similarly situated**

12  
13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **SOUTHERN DIVISION**

16 ELIZABETH LAVALLE, individually  
17 and on behalf of all others similarly  
18 situated,

19 Plaintiffs,

20 vs.

21 CHEXSYSTEMS and DOES 1to 10,  
22 inclusive,

23 Defendants.

Case No. SACV 08-01383 AHS (RNBx)

**SUPPLEMENTAL DECLARATION OF JENNY  
CUDWORTH RE: MOTION FOR FINAL APPROVAL  
OF CLASS SETTLEMENT**

Judge: Hon. Alicemarie Stotler  
Courtroom: 10-A  
Complaint Date: December 4, 2008

24 I, Jenny Cudworth, declare:

25 1. I am a Senior Consultant at Kurtzman Carson Consultants LLC ("KCC"), located at  
26 75 Rowland Way, Suite 250, Novato, California. I am over 21 years of age and am not a party to  
27 this action. I have personal knowledge of the facts set forth herein and, if called as a witness,  
28 could and would testify competently thereto. This declaration supplements the declaration I  
executed on September 2, 2011.

2. KCC was retained to, among other things, mail the Notice Packets, process Claim

1 Forms returned, and distribute checks to eligible claimants.

2 3. As of September 23, 2011, KCC received 537 Claim Forms, two of which were  
3 duplicates, resulting in 555 unique filed claims. Of the 555 unique claims, 141 are approved, 21  
4 are denied, and 373 were determined to be deficient. Notices of Deficient Claim Form with a  
5 deadline of September 16, 2011 have been mailed to the 373 whose claims were determined to be  
6 deficient. We are currently processing the responses to these Notices of Deficient Claim Form  
7 now.

8 4. Consistent with the distribution methodology that applies in this settlement, for  
9 each Valid Claim submitted, KCC will pay to the submitting Settlement Class Member eighty-  
10 two dollars (\$82.00) per Claimed Letter that Chex Systems sent to the submitting Settlement  
11 Class Member. The 141 Class Members with claims currently approved have a total of 155  
12 Claimed Letters, resulting in \$12,710.00 to be distributed. The minimum estimated amount to be  
13 distributed to the 373 Class Members who submitted a deficient Claim Form is \$34,358.00 and  
14 the maximum estimated amount to be distributed to the 373 Class Members who submitted a  
15 deficient Claim Form is \$51,332.00, resulting in a range from \$47,068.00 to \$64,042.00 to be  
16 distributed to the submitting Settlement Class Members.

17 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
18 knowledge and that this declaration was executed this 26<sup>th</sup> day of September 2011 at Novato,  
19 California.

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21 Jenny Cudworth  
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